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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 LUCERO SANCHEZ,

10 Plaintiff,

11 vs.

12 RENOWN HEALTH, a non-profit Nevada
13 Corporation, and DOES 1-20, inclusive,

14 Defendant

15 Case No.: 3:21-cv-00352-MMD-CSD

16 **STIPULATION AND [PROPOSED]**
17 **ORDER FOR EXTENSION OF TIME**
18 **TO FILE JOINT PRETRIAL ORDER**
19 **[SECOND REQUEST]**

20 Plaintiff Lucero Sanchez and Defendant Renown Health (collectively, the “Parties”), by and
21 through their counsel of record, hereby stipulate and agree that the deadline to file the Joint Pretrial
22 Order (“JPTO”), which is currently set for June 10, 2024, be extended for a period of sixty (60)
23 days until Friday, August 9, 2024, due to recent developments in this case described more fully
24 below.

25 The Parties and their counsel attended a settlement conference on April 10, 2024, but were
26 unable to resolve the case. Thereafter, counsel for the Parties began diligently reviewing the file to
27 confer and prepare the JPTO. While doing so, defense counsel identified a discrepancy in the
28 diaries produced by Plaintiff in this action. Defense counsel promptly notified Plaintiff’s counsel
of the discrepancy after the close of business on May 22, 2024. Counsel for the parties briefly
discussed the issue by phone the following morning and Plaintiff’s counsel filed a Motion to

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1 Withdraw as Counsel later that day. (ECF No. 92). A hearing regarding the Motion to Withdraw
2 as Counsel is scheduled before Magistrate Judge Denney on June 7, 2024. (ECF No. 95).

3 Plaintiff's counsel has represented to the Court that a fundamental breakdown in the
4 attorney/client relationship has necessitated his request to withdraw as counsel in this case.
5 Plaintiff's counsel has also denied having any knowledge that different versions of Plaintiff's diary
6 existed. Plaintiff is expected to attend the hearing on June 7, 2024. However, her position and/or
7 explanation regarding the existence of different versions of her diary is known only to her counsel
8 at this time and protected from disclosure by the attorney-client privilege. Given the unknown
9 circumstances of how different versions of Plaintiff's diaries were created and/or produced in this
10 case, Defendant intends to oppose the Motion to Withdraw as Counsel and move for sanctions.
11 Therefore, the results of the hearing regarding the Motion to Withdraw as Counsel are uncertain.

12 In light of these unusual developments, including the potential need for Plaintiff to secure
13 new counsel to try the case, the Parties request a 60-day extension up to and including August 9,
14 2024, by which to prepare and file the JPTO. This stipulation is made in good faith and not for
15 purposes of delay.

16 Dated: June 4, 2024

17 Dated: June 4, 2024

18 /s/ Luke Busby
19 LUKE BUSBY, ESQ
316 California Ave., #82
20 Reno, NV 89509
21 *Counsel for Plaintiff*

22 /s/ Sandra Ketner
23 SANDRA KETNER, ESQ.
24 Simons Hall Johnston PC
25 690 Sierra Rose Drive
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27 *Counsel for Defendant, Renown Health*

28 **ORDER**

29 **IT IS SO ORDERED.**

30 Dated this _____ day of _____ 2024.

31 U.S. District/Magistrate Judge